

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

COMPANIA SUD AMERICANA DE)	
VAPORES S.A.,)	
)	CIVIL ACTION NO. 5:11 CV 1679
)	
Plaintiff,)	
)	JUDGE DOWD
vs.)	
)	
SINOCHEM TIANJIN LIMITED f/k/a)	PLAINTIFF'S STATUS REPORT
SINOCHEM TIANJIN IMPORT AND)	
EXPORT CORP., ZHONGHUA TJ)	
CORPORATION; TIANJIN TIANLIAN)	
INTERNATIONAL TRADE COMPANY)	
LIMITED; SINOCHEM SHANGHAI)	
COMPANY; SINOCHEM LIAONING)	
COMPANY)	
)	
Defendants.)	

In accordance with this Court's order dated November 7, 2011, plaintiff Compania Sud Americana de Vapores S.A. ("CSAV") hereby submits the following status report on this case.

Pursuant to the order of maritime attachment and garnishment issued by this Court, garnishee Western Reserve Chemical Inc. is holding the sum of \$60,705.00, which is owed to defendant Sinochem Liaoning Co. ("Sinochem Liaoning"). Sinochem Liaoning has received notice of this attachment via Federal Express and email, and is represented by United States counsel, Andrews Kurth LLP, in connection with this attachment.

As set forth in the verified complaint, CSAV has filed similar actions against the captioned defendants in a large number of jurisdictions in addition to this District. Collectively, in other districts, approximately \$3.3 million of defendant Sinochem Shanghai Co. has been attached.

CSAV's United States counsel is Holland & Knight LLP. Warren E. Gluck, an attorney at Holland & Knight LLP has been in regular contact with Western Reserve Chemical Inc. ("Western Reserve"), concerning Western Reserve's obligations under the Rule B attachment order. Pursuant to the Rule B attachment order, Western Reserve continues to hold the sum of \$60,705.00.

CSAV's judgment is against Sinochem Tianjin Limited. The liability of Sinochem Shanghai and Sinochem Liaoning to CSAV is the subject of dispute. For the purpose of conserving the parties' and the various courts' resources, CSAV, Sinochem Shanghai and

Sinochem Liaoning are presently engaged in negotiations to consolidate the Sinochem Shanghai/Liaoning liability dispute in a single jurisdiction - New York.

The consolidation negotiations are advanced and the parties are presently negotiating language on mutually exchanged terms sheets. The basic premise of the consolidation is that the parties will stipulate to placing the attached funds - including the \$60,705.00 at issue here - into an escrow account pending the outcome of the New York litigation. The parties will further stipulate that the various attachment actions are stayed with respect to Sinochem Shanghai and Sinochem Liaoning, but that the attachment orders will remain in effect.

Hence, Sinochem Liaoning is aware of this action and the attachment, but has not appeared, and CSAV has not moved for default, in light of the ongoing consolidation effort.

We expect that the proposed consolidation will be finalized and agreed in the near future. Once that occurs, CSAV will file the proposed stipulations with this Court and the other jurisdictions where Sinochem Shanghai and Liaoning funds are attached. Western Reserve is aware of the proposed consolidation and has been happy to cooperate.

In light of the foregoing, CSAV respectfully requests a ninety-day period in which to complete the consolidation negotiations, and file the relevant stipulations and proposed orders. In the relatively unlikely event that the proposed consolidation fails, CSAV will immediately inform the court and proceed on the merits in this District.

RAY, ROBINSON, CARLE & DAVIES P.L.L.

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